

**THE FOUR HUNDRED SIXTY-NINTH OMNIBUS OBJECTION TO CLAIMS SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OBJECTION AND/OR THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THE OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
LEHMAN BROTHERS HOLDINGS INC.'S COUNSEL,  
JENNIFER LARSON, AT 212-310-8800.**

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Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	<b>:</b> <b>Chapter 11 Case No.</b>
	<b>:</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	<b>:</b> <b>08-13555 (SCC)</b>
	<b>:</b>
<b>Debtors.</b>	<b>:</b> <b>(Jointly Administered)</b>
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**NOTICE OF HEARING ON  
THE PLAN ADMINISTRATOR'S FOUR HUNDRED  
SIXTY-NINTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

**PLEASE TAKE NOTICE** that on June 2, 2014 Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced

chapter 11 cases, filed the four hundred sixty-ninth omnibus objection to claims (the “Four Hundred Sixty-Ninth Omnibus Objection to Claims”), and that a hearing (the “Hearing”) to consider the Four Hundred Sixty-Ninth Omnibus Objection to Claims will be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **July 16, 2014 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses to the Four Hundred Sixty-Ninth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and shall be served in accordance with General Order M-399 upon (i) the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 621; (ii) attorneys for LBHI, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Peter D. Isakoff, Esq., Garrett A. Fail, Esq., and Jennifer Larson, Esq.); and (iii) the Office of the United States Trustee for Region 2, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: William K. Harrington, Esq., Susan Golden, Esq., and Andrea B. Schwartz, Esq.); so as to be so filed and received by no later than **July 2, 2014 at 4:00 p.m. (Eastern Time)** (the

“Response Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Four Hundred Sixty-Ninth Omnibus Objection to Claims or any claim set forth thereon, the Plan Administrator may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Four Hundred Sixty-Ninth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: June 2, 2014  
New York, New York

/s/ Garrett A. Fail  
Peter D. Isakoff  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11 Case No.**  
:   
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**  
:   
**Debtors.** : **(Jointly Administered)**  
-----X

**THE PLAN ADMINISTRATOR'S FOUR HUNDRED  
SIXTY-NINTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN  
FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS FOUR  
HUNDRED SIXTY-NINTH OMNIBUS OBJECTION TO CLAIMS  
SHOULD REVIEW THE OBJECTION TO SEE IF THEIR NAME(S)  
AND/OR CLAIM(S) ARE LOCATED IN THE OBJECTION AND/OR THE  
EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THE  
OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
LEHMAN BROTHERS HOLDINGS INC.'S COUNSEL,  
JENNIFER LARSON, AT 212-310-8800.**

TO THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”) for the entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), respectfully represents as follows:

**RELIEF REQUESTED**

1. Each of the proofs of claim listed on Exhibit A annexed hereto (collectively, the “No Liability Claims”) was filed against LBHI based upon a purported guaranty of obligations by LBHI. After reviewing each No Liability Claim and the documentation provided in support thereof, the Plan Administrator has determined that, in each case, LBHI is not liable to the holders of such claims (collectively, the “Claimants”). Accordingly, the Plan Administrator files this omnibus objection pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “Procedures Order”) [ECF No. 6664], seeking disallowance and expungement of the No Liability Claims.

**JURISDICTION**

2. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

## **BACKGROUND**

### **A. General Background**

3. Commencing on September 15, 2008 and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. These chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b).

4. Lehman Brothers International (Europe) (“LBIE”) and Lehman Brothers Limited (“LBL”) are indirect subsidiaries of LBHI that are not debtors in these chapter 11 cases. On September 15, 2008, LBIE and LBL entered into separate administration proceedings under English insolvency law.

5. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Chapter 11 Estates to file omnibus objections to claims on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

6. On December 6, 2011, the Court entered an order confirming the Plan. The Plan became effective on March 6, 2012. Pursuant to the Plan, the Plan Administrator is authorized to interpose and prosecute objections to claims filed against the Chapter 11 Estates.

### **B. The No Liability Claims**

7. The No Liability Claims assert that LBHI, as an alleged guarantor, is liable for certain rebates (the “Rebates”) purportedly owed to Claimants by LBIE.

**THE NO LIABILITY CLAIMS SHOULD BE DISALLOWED AND EXPUNGED**

8. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, No. 02-41729, 2007 Bankr. LEXIS 660 at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

9. The No Liability Claims should be disallowed and expunged pursuant to section 502(b)(1) of the Bankruptcy Code. Upon information and belief, Claimants filed claims for the Rebates in LBIE’s insolvency proceeding, but LBIE denied having liability for such claims on the basis that the Rebates constitute liabilities of LBL. Upon further information and belief, Claimants rescinded their claims against LBIE for the Rebates and subsequently filed claims for the Rebates in LBL’s insolvency proceeding. Claimants have produced and the Plan Administrator has no evidence that LBHI ever issued a guaranty of the Rebates specifically or LBL’s obligations generally. Accordingly, Claimants do not have valid guaranty claims against LBHI, and the Plan Administrator has no basis for allowing their claims.

10. If the No Liability Claims remain on the claims register, the potential exists for recoveries by parties who do not hold valid claims against LBHI. Accordingly, the Plan Administrator respectfully requests that the Court disallow and expunge the No Liability Claims.

**RESERVATION OF RIGHTS**

11. The Plan Administrator reserves all rights to object on any other bases to any No Liability Claim as to which the Court does not grant the relief requested herein. The Plan Administrator reserves the right to conduct further discovery as to the No Liability Claims and any matters raised by Claimants and to supplement this and other filings as a result thereof.

**NOTICE**

12. No trustee has been appointed in these chapter 11 cases. Notice of this omnibus objection has been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) each claimant listed on Exhibit A; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]. The Plan Administrator submits that no other or further notice need be provided.

13. No previous request for the relief sought herein has been made by the Plan Administrator or the Chapter 11 Estates to this or any other Court.



WHEREFORE the Plan Administrator respectfully requests entry of an order  
granting the relief requested herein and such other and further relief as is just.

Dated: June 2, 2014  
New York, New York

/s/ Garrett A. Fail  
Peter D. Isakoff  
Garrett A. Fail

WEIL, GOTSHAL & MANGES LLP  
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Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates

**EXHIBIT A**

## OMNIBUS OBJECTION 469: EXHIBIT A - NO LIABILITY

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 CAISSE DE DEPOT ET PLACEMENT DU QUEBEC	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	23609	\$18,390.00	\$18,390.00	None
2 CATERPILLAR INC.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21572	\$3,990.61	\$3,990.61	None
3 CATERPILLAR INC. 401K	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21564	\$819.30	\$819.30	None
4 CATERPILLAR INC. VEBA	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21563	\$680.79	\$680.79	None
5 CHEVRON CORP INTERNATIONAL GROWTH	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21562	\$2,330.12	\$2,330.12	None
6 DALLAS POLICE & FIRE PENSION SYSTEM SELECT INTERNATIONAL	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21538	\$2,342.75	\$2,342.75	None
7 FIDELITY ADVISOR DIVERSIFIED INTERNATIONAL FUND,	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21651	\$32,353.59	\$32,353.59	None
8 FIDELITY ADVISOR EQUITY GROWTH FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21641	\$3,533.97	\$3,533.97	None
9 FIDELITY ADVISOR NEW INSIGHTS FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21653	\$1,391.27	\$1,391.27	None
10 FIDELITY ADVISOR OVERSEAS FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21644	\$3,578.94	\$3,578.94	None
11 FIDELITY BLUE CHIP GROWTH FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21647	\$18,732.11	\$18,732.11	None

## OMNIBUS OBJECTION 46: EXHIBIT A - NO LIABILITY

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
12 FIDELITY CONTRAFUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21640	\$12,301.87	\$12,301.87	None
13 FIDELITY EUROPE CAPITAL APPRECIATION FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21649	\$3,754.98	\$3,754.98	None
14 FIDELITY EUROPE FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21645	\$112,493.21	\$112,493.21	None
15 FIDELITY EUROPE FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	23607	\$50,830.00	\$50,830.00	None
16 FIDELITY FIFTY FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21650	\$3,123.01	\$3,123.01	None
17 FIDELITY GROWTH DISCOVERY FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21648	\$1,196.57	\$1,196.57	None
18 FIDELITY GROWTH STRATEGIES FUND, A SERIES OF FIDELITY MT. VERNON	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21616	\$999.84	\$999.84	None
19 FIDELITY INTERNATIONAL DISCOVERY FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21646	\$18,460.61	\$18,460.61	None
20 FIDELITY OVERSEAS FUND, A SERIES OF FIDELITY INVESTMENT TRUST	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21921	\$9,267.78	\$9,267.78	None
21 FIDELITY TREND FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21639	\$1,855.95	\$1,855.95	None
22 GROWTH PORTFOLIO,	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21642	\$3,638.26	\$3,638.26	None

## OMNIBUS OBJECTION 469: EXHIBIT A - NO LIABILITY

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
23 IPYRAMIS INTERNATIONAL GROWTH FUND LLC	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21566	\$1,086.70	\$1,086.70	None
24 IPYRAMIS SELECT INTERNATIONAL	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21565	\$467.29	\$467.29	None
25 IPYRAMIS SELECT INTERNATIONAL EQUITY FUND LLC	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21567	\$229.30	\$229.30	None
26 KENTUCKY RETIREMENT SYSTEMS INSURANCE FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21561	\$2,557.29	\$2,557.29	None
27 KENTUCKY RETIREMENT SYSTEMS PENSION FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21560	\$7,971.98	\$7,971.98	None
28 MID CAP PORTFOLIO	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21652	\$1,293.40	\$1,293.40	None
29 MINNESOTA STATE BOARD OF INVESTMENT	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21569	\$2,672.32	\$2,672.32	None
30 MINNESOTA STATE BOARD OF INVESTMENT This objection affects only the portion of claim number 65404 that is based on an alleged guaranty of certain rebates purportedly owed to the claimant.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	11/11/2009	65404	\$102,302.87	\$1,504.84	\$100,798.03
31 OHIO POLICE AND FIRE PENSION FUND	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21559	\$3,261.99	\$3,261.99	None
32 OREGON INVESTMENT COUNCIL This objection affects only the portion of claim number 21543 that is based on an alleged guaranty of certain rebates purportedly owed to the claimant.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21543	\$13,196.71	\$10,851.64	\$2,345.07

## OMNIBUS OBJECTION 46: EXHIBIT A - NO LIABILITY

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
33 OREGON INVESTMENT COUNCIL	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21655	\$956.70	\$956.70	None
34 OVERSEAS PORTFOLIO	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21643	\$5,932.38	\$5,932.38	None
35 PENSION FUND SOCIETY OF THE BANK OF MONTREAL, THE	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	23608	\$1,601.00	\$1,601.00	None
36 PRIM SELECT INTERNATIONAL PORTFOLIO	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21533	\$5,500.43	\$5,500.43	None
37 PRINCIPAL FUNDS, INC. - INTERNATIONAL FUND I	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21537	\$18,863.22	\$18,863.22	None
38 PYRAMIS SELECT GLOBAL EQUITY COMMINGLED POOL This objection affects only the portion of claim number 65411 that is based on an alleged guaranty of certain rebates purportedly owed to the claimant.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	11/11/2009	65411	\$21,780.91	\$230.62	\$21,550.29
39 SAN DIEGO COUNTY EMPLOYEES RETIREMENT ASSOCIATION This objection affects only the portion of claim number 21552 that is based on an alleged guaranty of certain rebates purportedly owed to the claimant.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21552	\$4,662.88	\$3,835.37	\$827.51
40 STANLIB WEALTH MANAGEMENT	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/21/2009	21570	\$18.47	\$18.47	None
TOTAL					\$500,421.37	\$374,900.47	\$125,520.90

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING FOUR HUNDRED SIXTY-NINTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred sixty-ninth omnibus objection to claims, dated June 2, 2014 (the “Four Hundred Sixty-Ninth Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, seeking to disallow and expunge the No Liability Claims pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], all as more fully described in the Four Hundred Sixty-Ninth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Sixty-Ninth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Sixty-Ninth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Sixty-Ninth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Sixty-Ninth Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Sixty-Ninth Omnibus  
Objection to Claims is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the No  
Liability Claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety  
with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all  
matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2014  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE